

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DEWITT HUGHES and CHERANNZETTA)	
STAGGER-HUGHES,)	
)	
Plaintiffs,)	
)	
v.)	08 C 627
)	
CITY OF CHICAGO, CHICAGO POLICE)	Judge Dow
OFFICER IZA, Star # 12957, and)	Magistrate Judge Cox
CHICAGO POLICE OFFICER UCZEN,)	
Star # 6857,)	
)	JURY TRIAL DEMANDED
Defendants.)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE AN ADDITIONAL
MOTION *IN LIMINE* BASED ON NEWLY-SUPPLEMENTED DISCOVERY**

Plaintiffs, by their counsel, Loevy & Loevy, respectfully seek leave to file an additional motion *in limine*. In support, Plaintiffs state as follows:

1. After many months of requests by Plaintiffs, Defendants recently supplemented their discovery responses with updated files regarding citizens' reports of the Defendant Officers' behavior.

2. In light of the newly-produced discovery, Plaintiffs seek leave to file a motion to bar the presentation of any argument or evidence that Defendants have "good" character, or any other evidence or argument attempting to bolster Defendants' credibility. To the extent that Defendants do introduce evidence to bolster their credibility or character, Plaintiffs plan to introduce evidence and witnesses in rebuttal, and Plaintiffs' counsel have informed Defendants of this fact.

3. Plaintiffs' proposed additional Motion *in Limine* (Number 12) is attached hereto as Exhibit A.

WHEREFORE, Plaintiffs respectfully request that this Court grant them leave to file the proposed Motion *In Limine* No. 12, attached as Exhibit A.

RESPECTFULLY SUBMITTED,

S/ Samantha Liskow
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CERTIFICATE OF SERVICE

The undersigned states that on July 5, 2012, I filed this Motion for Leave via CM/ECF and thus served them upon counsel of record.

/S/ Samantha Liskow